IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

BELTEX CORPORATION d/b/a	§	
FRONTIER MEATS,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 4:19-CV-00133
	§	
ROBERT HEATH TRUCKING, INC.	§	
and ROBERT HEATH LOGISTICS, INC.,	§	
LEGAL FREIGHTLINES, LLC	§	
	§	
Defendants,	§	
	§	
v.	§	
	§	
LEGAL FREIGHTLINES, LLC.	§	
	§	
Third Party Defendant.	§	

TAILIM SONG LAW FIRM'S UNOPPOSED MOTION TO WITHDRAW AS BELTEX CORPORATION D/B/A FRONTIER MEATS'S COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the Tailim Song Law Firm, counsel for Plaintiff Beltex Corporation d/b/a Frontier Meats, and files this, its Unopposed Motion to Withdraw as Counsel, and would respectfully show the court the following:

I.

Tailim Song Law Firm seeks to withdraw as counsel for Plaintiff Beltex Corporation d/b/a Frontier Meats. Good cause exists for withdrawal because Plaintiff has not paid Movant's reasonable fees, has failed to reasonably communicate with Plaintiff's counsel, and has failed to take required action for the defense of Plaintiff's case.

II.

Case 4:19-cv-00133-Y Document 43 Filed 07/28/20 Page 2 of 3 PageID 271

There are currently no pending deadlines for in the case and a no Scheduling Order has

been entered.

III.

The last known address for Beltex Corporation d/b/a Frontier Meats 3801 North Grove

Street Fort Worth, TX 76106. Eric Nauwelaers is the president of Plaintiff and has served as

Plaintiff's counsel's point of contact for Plaintiff. The last known phone number for Eric

Nauwelaers is (817) 624-1136. The last known email address for Eric Nauwelaers is

en@frontiermeats.com.

IV.

Counsel for Plaintiff Beltex Corporation d/b/a Frontier Meats has caused to be delivered to

Plaintiff a copy of this Motion by email, first class mail, and certified mail. Plaintiff has agreed to

the Motion. This Motion will not jeopardize the rights of the Plaintiff. This withdrawal is not

sought for delay only.

V.

WHEREFORE, PREMISES CONSIDERED, Tailim Song Law Firm prays that the Court

grant this Unopposed Motion to Withdraw as Beltex Corporation d/b/a Frontier Meats's Counsel

and be released from further obligation to the Plaintiff's as Attorney of Record.

Respectfully submitted,

TAILIM SONG LAW FIRM

/s/ Tailim Song

TAILIM SONG

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ATTORNEYS FOR PLAINTIFF BELTEX CORPORATION D/B/A FRONTIER MEATS

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July, 2020, a true and correct copy of the foregoing was served via electronic service via the Court's electronic filing system on all counsel of record.

/s/ Tailim Song	
Tailim Song	

CERTIFICATE OF CONFERENCE

Counsel for the movant has caused to be delivered to counsel for respondents and counsel for respondents have received a copy of the proposed motion. Counsel for respondents are unopposed to movant's motion.

Certified on July 24, 2020.		
	/s/ Tailim Song	
	Tailim Song	